

**REMARKS/ARGUMENTS**

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 16-23 are pending in this application. Since claims 9 and 14 have been canceled, the rejection of claims 9 and 14 under 35 U.S.C. §101, §112 and §102 are deemed moot. Applicant submits that new claims 16-23 are in full conformance with 35 U.S.C. §101, §112 and §102.

Independent claim 16 relates to simplifying a development work of a control program for vehicle control, which is stored in a first memory (e.g., ROM). A control program conventionally includes a platform program for acquiring input data and an application program for acquiring (e.g., calculating) control data based on the input data. When the application program is to be changed for some reason, e.g., for vehicle model change, both the platform program and the application program have to be developed in relation to each other. To simplify this development, according to the present invention, the control program is further provided with a coupling program, which performs mediation between the platform program and the application program. This coupling program converts first data, which has been acquired and stored in a first section of a second memory (e.g., RAM), to a second data suitable for use in the application program and stores the same. Since the application program use the second data and need not acquire the first data, the platform program need not be revised in association with the revision of the application program.

In more detail, claim 17 clearly defines that the coupling program operation and the platform program operation are performed at different intervals (e.g., 16 ms and 1 ms).

In Sakai et al (US '249, hereinafter "Sakai"), a communication conversion part (coupling) 200 converts data between the input data (e.g., received by the driver part (platform) 300) and the output data (e.g., stored in the common memory 210 and used by the application part (application) 100). However, Sakai fails to teach that the platform 300 and the coupling 200 stores the input data and the output data at different (first and second) memory sections under the management of the platform 300 and the coupling 200, respectively. In this respect, claim 16 is therefore not anticipated by or rendered obvious over Sakai.

In Sakai, data obtained from a driver (platform) processing 300 is stored in a common memory 210 after conversion processing 220. This stored data is updated each time a new communication data arrives irrespective of application processing 100. The application processing 100 uses the data available at the time of its processing. That is, Sakai does not store data of platform processing 300 and conversion processing 220 in different storage area of the memory as claimed.

Sakai further fails to teach that the coupling 200 converts the input data and stores the converted data at different intervals from that of receiving the input data of the by the platform 300. Claim 17 is therefore not anticipated by or rendered obvious over Sakai.

*MIYAMOTO et al.*  
*Application No. 10/734,285*  
*September 27, 2006*


**Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: \_\_\_\_\_

  
Raymond Y. Mah  
Reg. No. 41,426

RYM:sl  
901 North Glebe Road, 11th Floor  
Arlington, VA 22203  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100